

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; Eliza
Saunders, Director of the Office of Public
Records, in her personal and official
capacity; Alison Swenson, Compliance
Analyst, in her personal capacity; Perry
Tapper, Public Records Compliance
Officer, in his personal capacity; Andrew
Palmer, Compliance Analyst, in his
personal capacity; John or Jane Does 1-12,
in his or her personal capacity,

Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF JULIE DALESSIO IN
SUPPORT OF DENIAL OF DEFENDANTS'
MOTION FOR A PROTECTIVE ORDER

Note on Motion Calendar June 14, 2019

ORAL ARGUMENT REQUESTED

I, Julie Dalessio, declare as follows:

1. I am the Plaintiff in this above entitled action. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. On or about the end of April 2019, I received a CD containing files “PR-2019-00035 Release Ltr.pdf” “PR-2019-00035 Release.pdf” and “PR-2019-00035 Wholly Exempt Inventory.pdf” along with a letter with the heading “University of Washington Office of Public Records and Open Public meetings,” “re: Public Records Request PR-2019-00035 (COMPLETE)” and signed by Defendant Perry Tapper. I did not receive this CD with these documents until sometime after the deadline for Plaintiff’s response to the second motion for summary judgment. It would have been impossible for me to include this in the response to the second motion for summary judgment because I did not receive the documents until sometime after.
3. Attached hereto as Exhibit A is a true and correct copy of a letter from Defendant Perry Tapper to Public Records News Media dated March 26, 2019.
4. On May 30, 2019, I emailed a copy of the cd to my attorney, Mr. Thomas. Because of my poor health, I was not able to email my attorney any sooner about the documents.
5. Attached under seal are true and correct copies of 20 pages selected from the 1347 pages from the CD, public record PR-2019-00035

DATED this 4th day of June 2019, at Seattle, Washington.


Plaintiff Julie Dalessio